

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND DEVELOPMENT

vs.
JUNIPER NETWORKS, INC.

Case No.: 6:20-cv-00902-ADA

MOTION FOR ADMISSION PRO HAC VICE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Edward J. Naughton, applicant herein, and
moves this Court to grant admission to the United States District Court for the Western District of
Texas pro hac vice to represent plaintiff WSOU Investment, LLC in this case, and
would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)
Brown Rudnick LLP with offices at:
Mailing address: One Financial Center
City, State, Zip Code: Boston, MA 02111
Telephone: 617-856-8200 Facsimile: 617-856-8201
2. Since 12/15/1993, Applicant has been and presently is a
member of and in good standing with the Bar of the State of Maryland.
Applicant's bar license number is 9312150284.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>Commonwealth of Massachusetts</u>	<u>02/17/1995</u>
<u>US District Court - Massachusetts</u>	<u>10/20/1995</u>
<u>US Court of Appeals - 1st Circuit</u>	<u>09/14/1999</u>
<u>United States Court of Appeals for the Second Circuit</u>	<u>01/30/2018</u>
<u>United States Court of Appeals for the Federal Circuit</u>	<u>09/02/2004</u>
<u>District of Columbia</u>	<u>04/03/1995</u>
<u>United States District Court for the District of Connecticut</u>	<u>11/08/1999</u>
<u>United States District Court for the Northern District of Illinois</u>	<u>11/13/2007</u>

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. I ☒ have ☐ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: 6:20-cv-00725-ADA on the 14 day of August, 2020.

Number: 6:20-cv-00726-ADA on the 14 day of August, 2020.

Number: 6:20-cv-00727-ADA on the 14 day of August, 2020.

See Attachment A for additional cases.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

N/A

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Raymond W. Mort, III

Mailing address: 100 Congress Ave., Suite 2000

City, State, Zip Code: Austin, Texas 78701

Telephone: 512-865-7950


Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Edward J. Naughton to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Edward J. Naughton

[printed name of Applicant]



[signature of Applicant]

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 7 day of January, 2021.

Edward J. Naughton

[printed name of Applicant]


[signature of Applicant]

ATTACHMENT A

5. I have previously applied to Appear Pro Hac Vice in this district court in Cases[s]:

Number: 6:20-cv-00728-ADA on the 14 day of August, 2020

Number: 6:20-cv-00729-ADA on the 14 day of August, 2020

Number: 6:20-cv-00730-ADA on the 14 day of August, 2020

Number: 6:20-cv-00783-ADA on the 13 day of September, 2020

Number: 6:20-cv-00812-ADA on the 13 day of September, 2020

Number: 6:20-cv-00813-ADA on the 13 day of September, 2020

Number: 6:20-cv-00814-ADA on the 13 day of September, 2020

Number: 6:20-cv-00815-ADA on the 13 day of September, 2020

Number: 6:20-cv-00816-ADA on the 13 day of September, 2020

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ORDER

BE IT REMEMBERED on this day, there was presented to the Court the Motion for Admission Pro Hac Vice filed by Edward J. Naughton, counsel for plaintiff WSOU Investment, LLC, and the Court, having reviewed the motion, enters the following order:

IT IS ORDERED that the Motion for Admission Pro Hac Vice is GRANTED, and Edward J. Naughton may appear on behalf of plaintiff WSOU Investment, LLC in the above case.

IT IS FURTHER ORDERED that Edward J. Naughton, if he/she has not already done so, shall immediately tender the amount of \$100.00, made payable to: **Clerk, U.S. District Court**, in compliance with Local Court Rule AT-l(f)(2).

SIGNED this the _____ day of January, 20 21.

UNITED STATES DISTRICT JUDGE